## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano,	)
Plaintiff,	)
<b>v.</b>	) Civil Action No. 1:22-cv-00326-LM
The City of Nashua, et al.,	)
Defendants.	)
Determants.	

## <u>DEFENDANTS BOLTON AND LEONARD'S MOTION</u> <u>TO SUPPLEMENT THE RECORD</u>

Defendants Steven A. Bolton, Corporation Counsel for the City of Nashua, New Hampshire, and Celia K. Leonard, a Deputy Corporation Counsel for the City of Nashua, New Hampshire, move to supplement the record, and state as follows:

- 1. In Ms. Ortolano's affidavit in support of her objection to Bolton and Leonard's Motion for Summary Judgment, document 75-2 at ¶ 36(k), she pointed out that Exhibit A-10 to the Motion for Summary Judgment was an incorrect document.
- 2. After investigation, Bolton and Leonard determined that they had submitted an incorrect document as Exhibit A-10 due to an administrative error.
- 3. Bolton and Leonard now move to submit the correct document as Exhibit A-10. The correct Exhibit A-10 is attached to this motion as Exhibit 1.
- 4. A good faith attempt was made to obtain concurrence, but no response has been received as of filing.
- 5. No brief or memorandum of law is necessary in support of this motion, as it is addressed to the discretion of the Court in accordance with applicable rules.

WHEREFORE, Attorneys Bolton and Leonard respectfully request that:

- A. The Court grant this motion to supplement the record and accept the attached correct document as Exhibit A-10 to Bolton and Leonard's motion for summary judgment; and
  - B. For such other and further relief as the Court may deem appropriate.

Respectfully submitted,

Steven A. Bolton and Celia K. Leonard,

By their Counsel,

**UPTON & HATFIELD, LLP,** 

Date: May 8, 2024 /s/ Russell F. Hilliard

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was this day forwarded to all counsel of record through the Court's E-filing system.

/s/ Russell F. Hilliard

Russell F. Hilliard